

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WATER GREMLIN COMPANY, et al,

Debtors.¹

Chapter 11

Case No. 23-11775 (LSS)

(Jointly Administered)

**AMENDED NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 102(1) of title 11 of the United States Code (the “Bankruptcy Code”), Maslon LLP (“Maslon”), Allen Vellone Wolf Helfrich & Factor P.C. (“Allen Vellone Wolf Helfrich & Factor”) and Bayard, P.A. (“Bayard”) hereby enter their appearance in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Case”) as counsel to WBL HoldCo, LLC, Otter Lake Technologies, LLC, and Boundary Waters Fishing Tackle, LLC² (collectively, the “Clients”) and hereby request, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in Chapter 11 Case and copies of all papers served or required to be served in the Chapter 11 Case, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, chapter 11 plans, disclosure statements, and all other matters arising herein

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: WG Sub, LLC (“WG Sub”) (0781), Water Gremlin Holdings, Inc. (“Holdings”) (9250), and Water Gremlin Company (“Water Gremlin”) (6396).

² Maslon and Bayard previously entered their appearances on behalf of WBL HoldCo, LLC. WBL HoldCo, LLC assigned its rights under the Asset Purchase Agreement dated February 12, 2024 to Otter Lake Technologies, LLC and Boundary Waters Fishing Tackle, LLC. Accordingly, the appearance is being amended to update the client parties and to add additional counsel to the original appearance.

or in any related adversary proceeding, be given and served upon the Clients through service upon Maslon, Allen Vellone Wolf Helfrich & Factor, and Bayard at the addresses or e-mail addresses set forth below:

Jordan D. Factor
**ALLEN VELLONE WOLF
HELFRICH & FACTOR P.C.**
1600 Stout Street, Suite 1900
Denver, CO 80202
Email: jfactor@allen-vellone.com

Neil B. Glassman
Ericka F. Johnson
BAYARD, P.A.
600 North King Street, Suite 400
Wilmington, DE 19801
Email: nglassman@bayardlaw.com
ejohnson@bayardlaw.com

Amy J. Swedberg
MASLON LLP
3300 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402-4140
Email: amy.swedberg@maslon.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted, or conveyed by mail, hand delivery, telephone, telegraph, or otherwise filed or made with regard to the Chapter 11 Case and any proceedings therein.

PLEASE TAKE FURTHER NOTICE that, neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive the Clients' (i) right to have a final order in non-core matters entered only after *de novo* review by a United States District Court Judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or

(iv) other rights, claims, actions, defenses, setoffs or recoupments to which the Clients are or may be entitled to under agreements, in law, or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: December 31, 2024
Wilmington, Delaware

BAYARD, P.A.

/s/ *Ericka F. Johnson*

Neil B. Glassman (No. 2087)
Ericka F. Johnson (No. 5024)
600 North King Street, Suite 400
Wilmington, DE 19801
Telephone: (302) 655-5000
Email: nglassman@bayarlaw.com
Email: ejohnson@bayardlaw.com

-and-

MASLON LLP

Amy J. Swedberg
3300 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402-4140
Telephone: (612) 672.8367
Email: amy.swedberg@maslon.com

-and-

**ALLEN VELLONE WOLF
HELFRICH & FACTOR P.C.**

Jordan D. Factor
1600 Stout Street, Suite 1900
Denver, CO 80202
Telephone: (720) 245-2421
Email: jfactor@allen-vellone.com

*Counsel to WBL HoldCo, LLC, Otter Lake
Technologies, LLC, and Boundary Waters Fishing
Tackle, LLC*